

Before the FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of 2002 Biennial Regulatory Review -
Review of the Commission's Broadcast Ownership Rules
and Other Rules Adopted Pursuant to Section 202
of the Telecommunications Act of 1996,
Notice of Proposed Rulemaking,
MM Docket No. 02-277, (rel. Sept. 23, 2002)

To: The Secretary, FCC Commissioners, and Chief, Media Bureau

As a middle-aged citizen, father, and public high school teacher for many years, I am writing to you today to comment on Docket No. 02-277, The Biennial Review of the FCC's broadcast media ownership rules. I have been both an avid reader and a seeker for a wide diversity of information and cultural expression in many forms of media since my youth in the late Sixties and early Seventies. One of my favorite anecdotes has long been one about Miguel de Cervantes who in the early days of the printing press is said to have run down the street to pick any piece of paper that had writing on it so he could read it. That omniverous appetite for writing paid off when in his fifties Cervantes began to produce his enduring and beloved Don Quixote. Today many Americans have access to a diversity of periodical and published book writing that I'm sure would astound and delight Cervantes. However, in the more widespread public forum of electronic media--radio and television in particular--the lack of diversity, the lack of easy public access to expression in public media, the paucity of in depth information, and the low aesthetic level of most all of what is available to most Americans has been deplorable all of my adult life and is only getting worse.

I realize that what I have just written above are strongly critical opinions, but such views are commonplace among every group of Americans I have ever encountered and are just as frequently acknowledged by educated people worldwide. This commonplace view shames American democracy and the FCC in particular. Electronic media outlets since their inception have been public resources entrusted to the FCC for regulation. Like many, many of my fellow citizens, I feel that those electronic media channels are resources beyond price that should be diversified and democratic and richly varied culturally. Electronic media airwaves and channels are and need to remain the people of America's resources as much, and maybe more even than the coasts, forests, deserts and other treasured natural resources we have sought to preserve at least in some quantity. For me an FCC mandate of vigilant maintenance and expansion of the diversity, democracy and quality of electronic media is essential for our American democracy, economy, and public life generally. I have been disturbed and appalled by many decisions made in the past by the FCC that I feel contravene the purpose for which the FCC was created. Now I am moved in my busy life to write you about an imminent FCC decision to possibly allow further corporate concentration of media ownership. I strongly oppose this and urge you to reject each of the three removals of barriers to media ownership concentration that have been proposed.

In its goals to promote competition, diversity and localism in today's media market, I strongly believe that the FCC should retain all of the current media ownership rules now in question. These rules serve the public interest by limiting the market power of already huge companies in

the broadcast industry.

I do not believe that the studies commissioned by the FCC accurately demonstrate the negative affects media deregulation and consolidation have had on media diversity. While there may be indeed be more sources of media than ever before, the spectrum of views presented have become more limited.

And I want to support this view one bit of personal comment here that may not be frequently heard at the FCC, but a point that I think is very telling. I teach in an a very culturally diverse and economically largely low-income urban high school. My students do not read near as much as they "consume" electronic media. I think that their low test scores and frequent lack of interest in developing literacy skills and other academic skills, and even their frequent lack of interest in practical critical thinking life-skills come in significant part from the overt and sub-textual messages in the commercial electronic media that inundate their lives. Personally I can and do make sure that my daughter is exposed to very little network television or commercial radio. Her academic performance is impressive, as is the assessed academic abilities of most all students I have ever met who read widely from an early age and spend little time in front of a TV screen. However, it is unreasonable to expect parental behavior similar to mine from the largely overworked and less well-educated parents of the students I teach (though I feel strong public education initiatives about the negative effects of commercial media should be much more a part of public schooling and of government public relations efforts through agencies like the FCC.) It is, instead, the responsibility of the FCC to insure that those who do pay far more attention to electronic media than print have easy access to much more democratic, non-commercial and less commercial, pluralistic, culturally rich, and locally produced media fare than is presently readily available. An FCC that acted assertively to insure the kind of media I describe would, I think, be helping American education as much as it would further the positive development of our democracy and public culture generally. It is high time for such a fundamental reorientation of thought in the FCC.

The right to carry on informed debate and discussion of current events is part of the founding philosophy of our nation. Our forefathers believed that democracy was best served by a diverse marketplace of ideas. If the FCC allows our media outlets to merge, our ability to have open, informed discussion with a wide variety of viewpoints will be compromised. The public interest will best be served by preserving media ownership rules in question in this proceeding.

In addition, I support the FCC's plan to hold a public hearing on this matter in Richmond, VA in February 2003. I strongly encourage the Commission to hold similar hearings in all parts of the country and solicit the widest possible participation from the public which will be the most directly affected by the outcomes of these decisions. I think it is important for the FCC to not only consider the points of view of those with a financial interest in this issue, but also those with a social or civic interest.

With the serious impact these rule changes will have on our democracy, it is incumbent on the Commission to take the time to review these issues more thoroughly and allow the American people to have a meaningful say in the process.

Thank you,

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